

# **Exhibit B**

CONFIDENTIAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CHASOM BROWN,  
Plaintiff, Case No.  
vs. 4:20-cv-03664-YGR-SVK  
GOOGLE LLC,  
Defendant.

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CONFIDENTIAL

ZOOM VIDEOTAPED DEPOSITION OF  
JONATHAN E. HOCHMAN

July 20, 2022

10:15 a.m.

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TAKEN BY:  
JOSEF ANSORGE, ESQ.  
ATTORNEY FOR DEFENDANT

REPORTED BY:  
BELLE VIVIENNE, RPR, CRR, NJ-CRR,  
WA/CO/NM-CCR  
NATIONALLY CERTIFIED REALTIME  
COURT REPORTER  
JOB NO. 5308381

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1           A.       I mean, one thing I would point           13:56:09  
2       you to is -- is how often law enforcement           13:56:11  
3       goes and seeks this information and what           13:56:14  
4       their success rate is in identifying           13:56:15  
5       people, okay? That's been written up.           13:56:17

6                   But I also had a chance to ask           13:56:21  
7       Dave Nelson, who was until recently,           13:56:23  
8       employed by the FBI doing cyber           13:56:26  
9       investigations, and he said that he's done           13:56:28  
10      a lot of these investigations, and he           13:56:30  
11      always gets the perpetrator when he's got           13:56:32  
12      this data. It just doesn't -- it doesn't           13:56:35  
13      fail.           13:56:38

14      BY MR. ANSORGE:           13:56:38

15           Q.       Apart from IP address and user           13:56:41  
16      agent, is it your opinion that any of the           13:56:44  
17      other data at issue in this case           13:56:46  
18      constitutes PII?           13:56:48

19           A.       I mean, I think I've enumerated           13:56:51  
20      what the other data is and that,           13:56:53  
21      ultimately, you know, it may be a legal           13:56:55  
22      conclusion as to what is PII, but I think           13:56:58  
23      that a lot of this data is identifying,           13:57:03  
24      especially when taken together.           13:57:06

25                   So I want to be sure that no           13:57:09

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